



# Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | [www.pca.state.mn.us](http://www.pca.state.mn.us) | Equal Opportunity Employer

May 31, 2013

Mr. Joe Otte  
Wenck Associates, Inc.  
1802 Wooddale Drive, Suite 100  
St. Paul, MN 55125

Mr. Mark Ryan  
Carl Bolander & Sons Company  
251 Starkey Street  
St. Paul, MN 55107

RE: TCAAP Redevelopment #2 Site, 2020 Highway Avenue, Arden Hills.  
MPCA VIC Project Number VP22891  
MPCA PBP Site ID Number PB4302  
Construction Contingency Plan Approval

Dear Mr. Otte and Mr. Ryan:

The Minnesota Pollution Control Agency (MPCA) Petroleum Brownfields (PB) and Voluntary Investigation and Cleanup (VIC) Programs staff have reviewed the "Construction Contingency Plan" (CCP), dated May 2013, for the TCAAP Redevelopment #2 site located at the address referenced above (the Site). The CCP was prepared and submitted on your behalf by Wenck Associates, Inc. (Wenck).

The Site is comprised of approximately 427 acres of the western portion of the former Twin Cities Army Ammunition Plant (TCAAP) facility, as shown on the map in Attachment B. The Site was used for the production and storage of small arms ammunition from the 1940s to the mid-1990s. Prior to development in the 1940s, the Site was used for agricultural purposes.

Ramsey County has purchased 397 acres of the Site and will lease the remaining 30 acres of the Site from the United States (U.S.) Army until further subsurface investigation and necessary cleanup is completed, at which time the leased areas will be acquired. Ramsey County will complete subsurface investigations throughout the Site in accordance with an EPA/MPCA-approved Quality Assurance Project Plan (QAPP) and implement MPCA-approved response actions as necessary. Ramsey County plans to clean up the Site to allow unrestricted land use; however, future property use is anticipated to be mixed residential, commercial, and light industrial. Only data collected under an approved QAPP can be used to support a change in land use controls at the Site.

The CCP outlines the procedures to be followed when underground features (i.e. utility lines, etc.) and at-grade features (i.e. railroad lines, building slabs, etc.) are removed and/or demolished. No removal or demolition activities will take place on the 30 acres of leased property until response actions have been completed. For the remainder of the Site, the CCP proposes to document the presence of potential sources of contamination observed/discovered during slab removal by collecting GPS coordinates of those features, but postponing sampling of those areas until the pending QAPP has been approved.

The CCP is hereby approved subject to the following clarifications/modifications:

1. No building slab (or subgrade features within the slab footprint) shall be removed prior to QAPP approval, unless the former use(s) of the building were limited to administrative/warehouse activities or other benign uses. Please provide a list of buildings which Bolander may wish to demolish prior to QAPP approval, for VIC staff review and approval. For buildings with a history of manufacturing, equipment repair, or other activities involving chemical use, slab removal shall be postponed until the pending QAPP has been approved. This will allow potential sources of


contamination (drains, sumps, etc.) and discrete areas of potentially-contaminated soil to be sampled upon removal or discovery, as part of a more comprehensive investigation of sub-slab conditions. The plan to collect GPS coordinates for drains, sumps, and other significant features should be retained, as that information provides valuable documentation of existing site conditions.

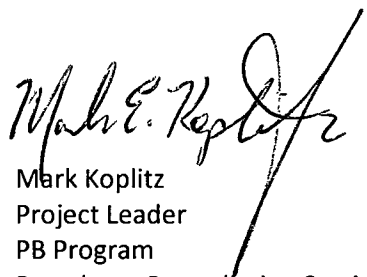
2. Full-time environmental oversight shall be provided by one or more trained environmental professionals during all activities which disturb or expose the soil.
3. Soils within areas potentially impacted by chlorinated solvents should be screened with a photoionization detector (PID) equipped with an 11.7 electron volt (eV) lamp.
4. Soil confirmation samples shall be collected from all remedial excavations in accordance with Section 7.0 of the MPCA's Site Characterization and Sampling Guidance. Post-removal verification sampling shall be performed when the excavation is deemed complete. If a QAPP-supported data point is necessary from that discrete area, a follow-up sample(s) can be collected when the QAPP has been approved. The need for a follow-up QAPP-supported sample will be determined by MPCA staff on a case-by-case basis.
5. If there is more than a de minimis volume of sediment in the storm sewers that leads to Round Lake, the sediment shall be sampled for PCBs and RCRA metals to determine appropriate disposal options for the sediment.
6. Fines screened from the rail bed shall also be analyzed for herbicides prior to reusing the material. Please propose a list of analytes and a volume-based sampling frequency for VIC staff review and approval prior to collecting the samples.

Because of the large scale of the demolition project, a series of CCP Implementation Reports would be helpful in terms of information management and project communication. Please consider a phased reporting approach, in which CCP implementation reports are prepared as different demolition/removal efforts are completed (for example, different utilities, individual (large) buildings, or groupings of smaller buildings).

Please be advised that the determination made in this letter is subject to the disclaimers found in Attachment A and is contingent on compliance with the terms and conditions set forth herein. If you have any questions on the above, please contact Shanna Schmitt at 651-757-2697 shanna.schmitt@state.mn.us or Mark Koplitz at 651-757-2502 or mark.koplitz@state.mn.us.

Sincerely,

  
Shanna Schmitt, P.G.  
Project Manager/Hydrogeologist  
VIC Program  
Site Remediation and Redevelopment Section  
Remediation Division

  
Mark Koplitz  
Project Leader  
PB Program  
Petroleum Remediation Section  
Remediation Division

SS:MK:ls

Enclosure

cc: Heather Worthington, Ramsey County  
Patrick Klaers, Arden Hills City Administrator  
Larry Carlson, Ramsey County Environmental Health Section  
Rick Kubler, Gray Plant Mooty  
Thad Lightfoot, Dorsey & Whitney

ATTACHMENT A  
DISCLAIMERS  
FORD TWIN CITIES PLANT  
MPCA PROJECT NUMBER VP22891  
MPCA PBP PROJECT NUMBER PB4302

1. Reservation of Authorities

The Minnesota Pollution Control Agency (MPCA) Commissioner reserves the authority to take any appropriate actions with respect to any release, threatened release, or other conditions at the Site. The MPCA Commissioner also reserves the authority to take such actions if the voluntary party does not proceed in the manner described in this letter or if actions taken or omitted by the voluntary party with respect to the Site contribute to any release or threatened release, or create an imminent and substantial danger to public health and welfare.

2. No MPCA Assumption of Liability

The MPCA, its Commissioner and staff do not assume any liability for any release, threatened release or other conditions at the Site or for any actions taken or omitted by the voluntary party with regard to the release, threatened release, or other conditions at the Site, whether the actions taken or omitted are in accordance with this letter or otherwise.

3. Letter Based on Current Information

All statements, conclusions and representations in this letter are based upon information known to the MPCA Commissioner and staff at the time this letter was issued. The MPCA Commissioner and staff reserve the authority to modify or rescind any such statement, conclusion or representation and to take any appropriate action under his authority if the MPCA Commissioner or staff acquires information after issuance of this letter that provides a basis for such modification or action.

4. Disclaimer Regarding Use or Development of the Property

The MPCA, its Commissioner and staff do not warrant that the Site is suitable or appropriate for any particular use.

5. Disclaimer Regarding Investigative or Response Action at the Property

Nothing in this letter is intended to authorize any response action under Minn. Stat. § 115B.17, subd. 12.